

Baker Hostetler

Application granted  
in substantial part.  
The schedule for  
expert disclosure  
is vacated; the  
parties shall, however,  
secure sufficient information  
from experts as  
needed to conduct  
meaningful settlement  
discussions.

December 10, 2010

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VIA ECF

Honorable Roanne L. Mann  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Ross University School of Medicine v. Brooklyn-Queens Health Care Inc. et al  
and Wyckoff Heights Medical Center  
No. 09 Civ. 1410 (KAM)(RLM)*

The December  
15<sup>th</sup> deadline for fact  
discovery remains  
unchanged.  
Counsel shall file  
an updated status  
report by February  
4, 2011.

**SO ORDERED:**  
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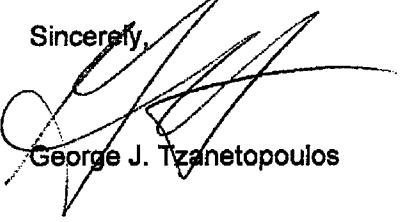
*Roanne L. Mann  
U.S. Magistrate Judge  
Dated: 12/10/10*

Dear Judge Mann:

I write in response to the Court's order of November 4, 2010 requiring that the parties submit a report to the Court on the status of their mediation efforts. Defense counsel, Walter P. Loughlin, has reviewed a draft of this letter and has authorized me to state that he agrees with its contents.

The parties have engaged Jonathon B. Marks of Marks ADR, LLC to serve as a mediator. We are attempting to finalize plans for a session with Mr. Marks on January 31 and February 1, 2011 (there are still some participants whose availability for those dates is unknown). Accordingly, the parties respectfully request that the present discovery schedule be vacated with the understanding that the parties will report to the Court on a date of the Court's convenience after February 1, 2011.

Sincerely,

  
George J. Tzanetopoulos

Cc: Walter P. Loughlin, Esq.

Chicago Cincinnati Cleveland Columbus Costa Mesa  
Denver Houston Los Angeles New York Orlando Washington, DC